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WRITER'S DIRECT E-MAIL:

June 8, 2001

**VIA HAND DELIVERY**

The Honorable J. Frederick Motz  
 Chief Judge  
 United States District Court  
 District of Maryland  
 101 W. Lombard Street  
 Baltimore, Maryland 21201

**Re: CONSOLIDATED CASES**

*The Whiting-Turner Contracting Company v. Mass. Electric Construction Co., et al*  
 U.S. District Court for the District of Maryland Case No.: JFM 00 835  
 and  
*Mass Electric Construction Co., et al v. Whiting-Turner Contracting Co.*  
 U.S. District Court for the District of Maryland Case No.: JFM 00 1885

Dear Judge Motz:

The purpose of this letter is to request approval of the parties' agreement to amend the present scheduling order and to extend the discovery deadline until November 21, 2001.

As you may be aware from previous correspondence, discovery in this case has proceeded with all deliberate speed. However, due to the huge volume of documentation arising out of the Central Light Rail construction project which is the subject matter of this case, the process has been slower than expected.

In order to produce their reports, the parties' experts need to review and utilize certain critical project records. Some of these critical records have been difficult to locate and the parties are now making extraordinary efforts to find them. Notwithstanding those efforts, this process has extended the time it has taken for the experts to do their work.



The Honorable J. Frederick Motz,  
 Chief Judge  
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As a result, Whiting-Turner, with the consent of Mass Electric, hereby requests that the existing schedule be amended as follows:

	<u>Current Schedule</u>	<u>Revised Schedule</u>
Deadline for Whiting-Turner to make disclosures of expert opinions	June 11, 2001	July 9, 2001
Mediation Conference	June 20, 2001	June 20, 2001
Deadline for Mass Electric to make Disclosures of expert opinions	August 8, 2001	October 24, 2001
Deadline for Whiting-Turner to make disclosure of rebuttal expert opinions	September 7, 2001	November 21, 2001
Discovery deadline	October 31, 2001	January 30, 2002

Respectfully submitted,

Huddles & Jones, P.C.

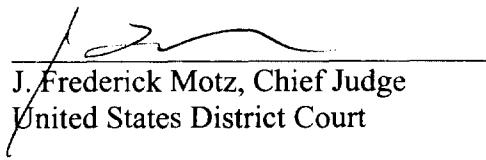


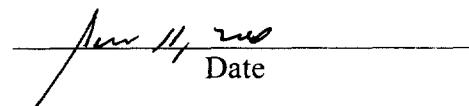
William M. Huddles  
 Counsel for The Whiting-Turner Contracting Co.

WMH/pas

cc: Kieran Meagher, Esquire, Counsel for Mass Electric (via facsimile & first class mail)  
 Christopher J. Heffernan, Esquire, Counsel for Mass Electric (via facsimile & first class mail)

**APPROVED AND SO ORDERED**

  
 J. Frederick Motz, Chief Judge  
 United States District Court

  
 June 11, 2001  
 Date